

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

_____	)	
UNITED STATES OF AMERICA	)	
	)	
v.	)	CRIMINAL NO. 05-M-0471-RBC
	)	
JANICE PIERRE	)	
_____	)	

**MOTION TO CHANGE HEARING TIME**

Now comes the defendant in the above-entitled matter and requests that the hearing presently scheduled for November 28, 2005 at 11:30 a.m. be changed to 4:00 p.m. and assigns as reasons therefor the following:

1. Originally the date was set by the Court for November 30, 2005.
2. Defendant's counsel was able to appear on November 30, 2005 at the time scheduled by the Court.
3. The Court changed the date of the hearing to Monday, November 28, 2005 at 11:30 a.m.
4. On Monday, November 28, 2005 at 9:00 a.m., defendant's counsel is scheduled for the Haverhill District Court on one matter.
5. Defendant's counsel believes that he will not be able to appear timely for the November 28, 2005, 11:30 a.m. hearing.

6. Defendant's counsel believes that he can safely appear by 2:00 p.m. on November 28, 2005.

7. The Clerk informed defendant's counsel that the Court schedule was such that the Court could not place the matter on for hearing before 4:00 p.m. on November 28, 2005.

8. Defendant's counsel can be at the hearing on November 28, 2005 at 4:00 p.m.

**WHEREFORE**, for the above reasons, the defendant respectfully requests that the time of the hearing on November 28, 2005 be changed from 11:30 a.m. to 4:00 p.m.

The Defendant  
By His Attorney,

/s/ James B. Krasnoo  
James B. Krasnoo  
(BBO #279300)  
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**CERTIFICATE OF SERVICE**

I, hereby certify that a true copy of the above document was served upon Seth P. Berman, Assistant United States Attorney by Electronic Filing and first class mail on November 16, 2005.

/s/ James B. Krasnoo  
James B. Krasnoo